

EXHIBIT B

Declaration of Michael Gannon

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ANTHONY CERVANTES and ADAM ST.
AMOUR, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

CRST INTERNATIONAL, INC., CRST
EXPEDITED, INC. and DOES 1 through 10,
inclusive,

Defendants.

Case No. 1:20-cv-10106-PBS

Honorable Judge Patti B. Saris

DECLARATION OF MICHAEL GANNON

I, Michael Gannon, declare and state as follows:

1. I am the Chief Operating Officer (“COO”) for CRST International, Inc. (“CRST International”). I submit this declaration in support of Defendants’ Motion to Transfer and Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue.

2. I have personal knowledge of the facts contained in this declaration and, if called as a witness, I could and would testify competently as to their accuracy.

3. CRST International is incorporated and headquartered in Iowa. Its principal place of business is located at 3930 16th Avenue SW, Cedar Rapids, IA 52406.

4. CRST International and CRST Expedited, Inc. (“CRST Expedited”) are owned by the same parent company.

5. CRST International provides various administrative services to CRST Expedited under a service agreement.

6. CRST International does not establish policies for CRST Expedited nor does it

manage the operations of CRST Expedited.

7. All corporate and legal functions for CRST International operate out of Iowa.
8. CRST International is not a motor carrier, does not own or operate trucks, and neither employs drivers nor contracts with owner-operator independent contractors.
9. CRST International has no physical locations, employees, or bank accounts in Massachusetts.
10. CRST International is not registered to do business in Massachusetts.
11. CRST International never employed, contracted with, or had any other relationship with Plaintiffs Anthony Cervantes or Adam St. Amour.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 17th of April, 2020, at Cedar Rapids, Iowa.



Michael Gannon